



**United States Environmental Protection Agency**

**Region I**

**5 Post Office Square, Suite 100  
Boston, MA 02109-3912**

**URGENT MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

**FEB 16 2016**

Mr. George LaCapra, Jr.,  
President  
UniMetal Surface Finishing  
135 South Main Street  
Thomaston, CT 06787

**RE: NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA), and the Regulations of Connecticut State Agencies (RCSA): 22a-449(c)-100 through 119.

Dear Mr. LaCapra:

On December 3-4, 2014, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of UniMetal Surface Finishing, EPA ID No. CTD981213101 with RCSA 22a-449(c)-100 through 119, and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of RCSA 22a-449(c)-100 through 119 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to make adequate hazardous waste determinations;
2. Failure to ensure that each container of hazardous waste is clearly marked or labeled with the words "hazardous waste," and that the hazardous waste(s) are identified in words;
3. Failure to ensure that [satellite area accumulation (SAA)] containers are clearly labeled with the words "hazardous waste," the hazardous waste(s) described in words, and with the type of hazards(s) associated with the waste(s) indicated in words;
4. Failure to ensure that each container in which hazardous waste is being accumulated is marked with the date upon which the period of accumulation begins;
5. Failure to ensure that hazardous wastes are accumulated in SAA containers that are at or near the point of generation

6. Failure to ensure that each SAA container is under the control of the operator of the process generating the wastes;
7. Failure to conduct hazardous waste training;
8. Failure to maintain proof of distribution of copies of the hazardous waste contingency plan;
9. Failure to maintain, and submit to local authorities, an updated contingency plan;
10. Failure to properly store universal waste lamps and universal waste batteries; and
11. Failure to properly mark or label universal waste mercury-containing lamps and universal waste batteries.

**Immediately upon receipt of this NOTICE:**

**UniMetal Surface Finishing must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.**

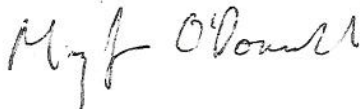
On December 10, 2014, EPA received an email from Mr. Jim Murphy (UniMetal Corporate Environmental Manager) which detailed steps undertaken, within the first week after the inspection, to correct items 3 through 6 and 8 through 11, above.

**Within (30) thirty calendar days of receipt of this NOTICE**, submit a written description, with supporting documentation, of the actions taken to address items 1, 2 and 7 above. Submit the information to:

Susann D. Nachmann, Environmental Engineer  
U.S. Environmental Protection Agency  
Office of Environmental Stewardship (OES05-4)  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Susann D. Nachmann, of my staff, at (617) 918-1871.

Sincerely,



Mary Jane O'Donnell, Manager  
RCRA, EPCRA & Federal Programs Unit

cc: Joseph Schiavone, CT DEEP